

JAYME B. SULLIVAN
BOISE CITY ATTORNEY

Ed Jewell ISB No. 10446
Deputy City Attorney
BOISE CITY ATTORNEY'S OFFICE
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500
Telephone: (208) 608-7950
Facsimile: (208) 384-4454
Email: ejewell@cityofboise.org
boisecityattorney@cityofboise.org

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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for Intervenor

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION TO EXPAND
OPTIONAL CUSTOMER CLEAN ENERGY
OFFERINGS THROUGH THE CLEAN
ENERGY YOUR WAY PROGRAM

Case No. IPC-E-21-40

**CITY OF BOISE CITY'S
PETITION TO INTERVENE**

COMES NOW, the city of Boise City, herein referred to as "Boise City," and pursuant to Rules 71 through 73 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.71 – 31.01.0.73), the Application filed on December 2, 2021, hereby requests leave to intervene in this matter and to appear and participate as a party. As grounds, Boise City states as follows:

1. The name and address of this Intervenor is:

City of Boise City
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

2. Copies of all pleadings, production requests, production responses, Commission orders, and other documents should be sent to the following:

Ed Jewell
Deputy City Attorney
BOISE CITY ATTORNEY'S OFFICE
150 N. Capitol Blvd.
P.O. Box 500
Boise, Idaho 83701-0500
Telephone: (208) 608-7950
Facsimile: (208) 384-4454
Email: ejewell@cityofboise.org
boisecityattorney@cityofboise.org

Wil Gehl
Energy Program Manager
BOISE CITY DEPT. OF PUBLIC WORKS
150 N. Capitol Blvd.
P.O. Box 500
Boise, Idaho 83701-0500
Telephone: (208) 608-7571
Email: wgehl@cityofboise.org

In compliance with Order No. 35058, all service in this docket is to be completed electronically. If the Commission decides to return to hard copy service during this docket, Boise City requests hard copies of pleading, testimony, and briefs only. All other production requests, responses, notices, Commission orders, and other filings may be served on Boise City via electronic mail in accordance with Rule 63 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.063).

3. Boise City is a Municipal Corporation organized under the laws of the state of Idaho.


4. Boise City has a direct and substantial interest in this matter as representing the public interest of Idaho Power Company ("Idaho Power") customers that make up its constituency. Boise City is also a large Idaho Power customer with Schedule 7, 9, and 19 electric service accounts. Boise City also maintains multiple solar panel installations and net metering facilities, such as those located at the Twenty Mile South Farm Administration and Maintenance Building. As an Idaho Power customer with expressed clean energy preferences, this proceeding directly impacts Boise City's ability to meet its community clean energy goals with an optional renewable energy procurement program. Without the opportunity to intervene herein, Boise City would not have the direct means of ensuring the outcome of this proceeding positively impacts the

environmental, health, and economic concerns of Boise City and its citizens. Granting Boise City's petition to intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

5. Boise City intends to fully participate in this matter as a party and appear in all matters as is appropriate. The nature and quality of Boise City's intervention in this proceeding is dependent upon the nature and effect of other evidence in this proceeding. If necessary, Boise City may present evidence; call and examine witnesses; and present argument.

WHEREFORE, the city of Boise City, respectfully requests that this Commission grant this Petition to Intervene and issue a timely order as set forth in IDAPA 31.01.01.075.

DATED this 25th day of January 2022.



Ed Jewell,
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 25th day of January 2022, served the foregoing documents on all parties of record as follows:

<p>Jan Noriyuki Commission Secretary Idaho Public Utilities Commission 11331 W Chinden Blvd., Ste. 201-A Boise, ID 83714 jan.noriyuki@puc.idaho.gov</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic <input type="checkbox"/> Other: _____</p>
<p>Riley Newton Deputy Attorney General Idaho Public Utilities Commission 11331 W Chinden Blvd., Ste. 201-A Boise, ID 83714 riley.newton@puc.idaho.gov</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic <input type="checkbox"/> Other: _____</p>
<p>Lisa Nordstrom Lead Counsel Idaho Power Company PO Box 70 Boise, ID 83707 lnordstrom@idahopower.com dockets@idahopower.com</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic <input type="checkbox"/> Other: _____</p>
<p>Alison Williams Regulatory Policy & Strategy Advisor Idaho Power Company PO Box 70 Boise, ID 83707 awilliams@idahopower.com knoe@idahopower.com</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic <input type="checkbox"/> Other: _____</p>
<p>Benjamin J. Otto Emma E. Sperry Idaho Conservation League 710 N 6th Street Boise, ID 83702 botto@idahoconservation.org eserry@idahoconservation.org</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic <input type="checkbox"/> Other: _____</p>
<p>Peter J. Richardson Richardson Adams, PLLC 515 N 27th Street Boise, ID 83702 peter@richardsonadams.com <i>for Industrial Customers of Idaho Power</i></p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic <input type="checkbox"/> Other: _____</p>

<p>Dr. Don Reading 6070 Hill Road Boise, ID 83703 dreading@mindspring.com <i>for Industrial Customers of Idaho Power</i></p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic <input type="checkbox"/> Other: _____</p>
<p>Norman M. Semanko Parsons Behle & Latimer 800 W Main Street, Suite 1300 Boise, ID 83702 nsemanko@parsonsbehle.com <i>for Walmart</i></p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic <input type="checkbox"/> Other: _____</p>
<p>Vicki M. Baldwin, <i>pro hac vice</i> Parsons Behle & Latimer 201 South Main Street, Suite 1800 Salt Lake City, UT 84111 vbaldwin@parsonsbehle.com <i>for Walmart</i></p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic <input type="checkbox"/> Other: _____</p>
<p>Steve W. Chriss Director, Energy Services Walmart, Inc. 2608 Southeast J Street Bentonville, AR 72716 stephen.chriss@walmart.com</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic <input type="checkbox"/> Other: _____</p>



 Michelle Steel,
 Paralegal